

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Crim No. 24-CR-10098-ADB
)	
AMY NDEYE THIOUB,)	
)	
Defendant)	

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(c).

1. Rule 11 Hearing or Trial

The defendant has not yet completed her review of discovery, and therefore is not in a position to determine whether this case should be transferred to the district judge for a Rule 11 hearing or trial.

2. Status of Discovery

On May 21, 2024, the government produced automatic discovery as required under the Local Rules. The government supplemented its automatic discovery on July 19, 2024. The government is aware of its ongoing obligation to produce additional discovery.

With its May 21, 2024 production, the government requested reciprocal discovery from the defendant; no such discovery has been produced at this time.

3. Discovery Requests and Motions

The defendant will serve any discovery requests on or before September 30, 2024, and will file discovery motions as necessary thereafter.

4. The Timing of Pretrial Motions

The defendant intends to file substantive motions on or before October 31, 2024.

5. Estimated Length of Trial

If a trial is necessary, the parties estimate that a trial in this matter would take approximately one week.

6. Excludable Delay

There are currently 70 days remaining under the Speedy Trial Act. The parties jointly ask the Court to exclude the time from August 13, 2024 until the date of the next status conference, under 18 U.S.C. § 3161(h)(7)(A), because the parties have needed the time, and continue to need the time, to review discovery and prepare motions in this case. The ends of justice served by this exclusion outweigh the interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Ndeye Amy Thioub
By her attorney,

/s/Vikas S. Dhar
Vikas S. Dhar, Esq.

JOSHUA S. LEVY
Acting United States Attorney

By: /s/Kristina E. Barclay
Kristina E. Barclay
Assistant U.S. Attorney

Dated: August 7, 2024